

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN INTERNATIONAL GROUP,)	
INC., et al.,)	
)	
Plaintiffs,)	No. 07 CV 2898
vs.)	
)	District Judge Robert W. Gettleman
ACE INA HOLDINGS, INC., et al.,)	
)	Magistrate Judge Sidney I. Schenkier
Defendants.)	

SAFECO INSURANCE COMPANY OF)	
AMERICA, et al., individually and on behalf)	
of a class consisting of members of the)	
National Workers Compensation Reinsurance)	No. 09 CV 2026
Pool,)	
)	District Judge Robert W. Gettleman
Plaintiffs,)	
vs.)	Magistrate Judge Sidney I. Schenkier
)	
AMERICAN INTERNATIONAL GROUP,)	
INC., et al.,)	
)	
Defendants.)	

**SETTLEMENT CLASS REPRESENTATIVES'
MOTION FOR LEAVE TO FILE OVERSIZED BRIEF**

Plaintiffs in Intervention ACE INA Holdings, Inc., Auto-Owners Insurance Co., Companion Property & Casualty Ins. Co., FirstComp Insurance Co., The Hartford Financial Services Group, Inc., Technology Insurance Co., and The Travelers Indemnity Company (collectively, "Intervenors" or "Settlement Class Representatives"), by their undersigned counsel, hereby move pursuant to Local Rule 7.1 to file a 22-page brief, attached hereto as Exhibit 1, in support of their Rule 24

Motion to Intervene and Request for Stay of Ruling on Motion for Class Certification.

In support thereof, the Intervenor state as follows:

1. This class action has been pending for over three years and involves complex claims arising from insurance companies' participation in a complex sector of the insurance business.

2. By their Rule 24 Motion to Intervene and Request for Stay of Ruling on Motion for Class Certification, the Intervenor seek to intervene as settlement class representatives in this protracted and complex litigation in order to present a global settlement to the Court.

3. The Settlement Class Representatives' Memorandum of Law in Support of Rule 24 Motion to Intervene and Request for Stay of Ruling on Motion for Class Certification presents, as succinctly as possible, those facts and legal arguments necessary for determining whether intervention is appropriate pursuant to Federal Rule of Civil Procedure 24, and whether the Court should stay issuance of its ruling on the pending Motion for Class Certification. Given the complex nature of the claims at issue in this case, and the importance of explaining the parties' settlement efforts, the Intervenor have used 22 pages for their memorandum in order to describe the relevant facts and present their arguments to the Court for consideration. The Intervenor respectfully submit that a total of 7 pages over the customary page limit constitutes a reasonable enlargement.

WHEREFORE, for the foregoing reasons, ACE INA Holdings, Inc., Auto-Owners Insurance Co., Companion Property & Casualty Ins. Co., FirstComp Insurance Co., The Hartford Financial Services Group, Inc., Technology Insurance

Co., and The Travelers Indemnity Company respectfully seek leave to file their 22-page Memorandum of Law in Support of Rule 24 Motion to Intervene and Request for Stay of Ruling on Motion for Class Certification, and for all other and further relief deemed appropriately by the Court.

Dated: January 5, 2011

Respectfully submitted,

ACE INA HOLDINGS, INC., AUTO-OWNERS
INSURANCE CO., COMPANION PROPERTY &
CASUALTY INS. CO., FIRSTCOMP INSURANCE
CO., THE HARTFORD FINANCIAL SERVICES
GROUP, INC., TECHNOLOGY INSURANCE CO.,
and THE TRAVELERS INDEMNITY COMPANY

By /s/ Kerry D. Nelson

One of Their Attorneys

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